

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**IN RE GOOGLE INC. COOKIE  
PLACEMENT CONSUMER PRIVACY  
LITIGATION**

**Case No. 12-MD-2358**

**This Document Relates to:  
All Actions**

**PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO FILE MOTION FOR PRELIMINARY  
APPROVAL AND RESPONSE**

COME NOW Plaintiffs, by and through their counsel of record, and with consent of defendant Google LLC (formerly Google, Inc.), and move this Court pursuant to F.R.C.P. 6(b)(1)(A) for an order allowing an extra fourteen (14) days for Plaintiffs to submit their Motion for Preliminary Approval and for defendant to file any response thereto, and in support of the same state as follows:

1. Following the Third Circuit Opinion, *In re: Google Inc. Cookie Placement Consumer Privacy Litigation*, 934 F.3d 316, 326 (2019), the parties met and conferred regarding the settled litigation.
2. Section 15.5 of the Settlement Agreement requires the parties to cooperate to effectuate the settlement. As a result of the 3<sup>rd</sup> Circuit decision, the parties recognized that some

modifications were necessary with respect to the *cy pres* recipients and the type of class certification sought.

3. The parties reached a preliminary agreement on modifications to the method *cy pres* recipients would be chosen so as to effectuate their intent as well as answer the objections of the Third Circuit. The parties reported this preliminary agreement to the court in a Joint Status Report filed on November 12, 2019 (Doc. 189), in which the parties proposed a date for the filing of a motion for preliminary approval of December 20, 2019.
4. On November 16, 2019 this court entered its order (Doc. 190) directing Plaintiffs to file a motion for preliminary approval of the class action settlement and certification of the settlement class by December 20, 2019, with defendant's response due January 7, 2020.
5. In crafting the motion for preliminary approval and class certification, the parties have decided that it may be beneficial to the Court to provide some additional briefing and evidentiary support that will take some additional time to prepare. Plaintiffs are diligently working on such briefing and are also engaged in an effort to obtain this evidence.
6. For these reasons, additional time is necessary to finalize the motion and attachments. Plaintiffs ask the court to extend the deadlines for the filing of the motion and response a total of 14 (fourteen) days. Such extension would call for the motion for preliminary approval to be due on January 3, 2020 and the response due on January 21, 2020.
7. This brief extension will not prejudice either party; nor will it cause any significant delay in this Court's administration of justice. Rather, the extension is necessary to present to the Court the best possible Motion and evidence in support of the settlement.

8. Counsel for defendant Google LLC has been contacted and has confirmed that Google LLC does not oppose this request for an extension of time.

WHEREFORE, for good cause shown, Plaintiffs respectfully request that this Court extend the deadlines mentioned above such that the Motion for preliminary approval of the class action settlement will be due on January 3, 2020 and any necessary response thereto be due on January 21, 2020.

Dated December 10, 2019

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